



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 30, 2014

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Trenton Telephone Company  
Study Area Code 220389**

Dear Ms. Dortch:

On behalf of Trenton Telephone Company (“Trenton”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Trenton seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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June 30, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Trenton Telephone Company  
Study Area Code 220389  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Trenton Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	220389
<015> Study Area Name	TRENTON TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Adam Austin
<035> Contact Telephone Number: Number of the person identified in data line <030>	7063982900 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	adam@tvn.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div>220389GA510.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div>220389GA610.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div></div> (attach descriptive document)		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data Adam Austin	
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@twn.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes)                 <input checked="" type="radio"/> (no)             </div>
<111>		<div> <input type="radio"/> (yes)                 <input type="radio"/> (no)             </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

220389GA112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvm.net

[illegible]







OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

Operating Company

-- See attached worksheet --

<b>(900) Tribal Lands Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	220389	
<015>	Study Area Name	TRENTON TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data		
<035>	Contact Telephone Number - Number of person identified in data line <030>	Adam Austin	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net	
<910>	Tribal Land(s) on which ETC Serves		
<div></div>			
<920>	Tribal Government Engagement Obligation		
<div></div>			
Name of Attached Document			
<div></div>			
If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:			
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	<div><div>Select (Yes, No, NA)</div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div>	
<922>	Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner;		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Tribal Business and Licensing requirements.		

(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	

☐

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP [www.tvn.net](http://www.tvn.net)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

☒

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

☒

<1222> Details on the number of minutes provided as part of the plan,

☒

<1223> Additional charges for toll calls, and rates for each such plan.

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

**CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.**

<b>Incremental Connect America Phase I reporting</b>	
<2010> 2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011> 3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
<b>Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))</b>	
<2012> 2013 Frozen Support Certification	<input type="checkbox"/>
<2013> 2014 Frozen Support Certification	<input type="checkbox"/>
<2014> 2015 Frozen Support Certification	<input type="checkbox"/>
<2015> 2016 and future Frozen Support Certification	<input type="checkbox"/>
<b>Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))</b>	
<2016> Certification Support Used to Build Broadband	<input type="checkbox"/>
<b>Connect America Phase II Reporting (47 CFR § 54.313(e))</b>	
<2017> 3rd year Broadband Service Certification	<input type="checkbox"/>
<2018> 5th year Broadband Service Certification	<input type="checkbox"/>
<2019> Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@ttn.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div></div> <div>(Yes/No)</div>
(3014)	If yes, does your company file the RUS annual report	<div></div> <div>(Yes/No)</div>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div></div> <div>(Yes/No)</div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div></div> <div>(Yes/No)</div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3018)	If the response is no on line 3014, Is your company audited?	<div></div> <div>(Yes/No)</div>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div></div> <div>(Yes/No)</div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div></div> <div>(Yes/No)</div>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<div></div> <div>(Yes/No)</div>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div></div> <div>(Yes/No)</div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div></div> <div>(Yes/No)</div>
(3024)	Underlying information subjected to an officer certification.	<div></div> <div>(Yes/No)</div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div></div> <div>(Yes/No)</div>
(3026)	Attach the worksheet listing required information	<div></div> <div>Name of Attached Document Listing Required Information</div>

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	220389
<015> Study Area Name	TRENTON TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Adam Austin
<035> Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>John Staurulakis, Inc.</u>	
Name of Reporting Carrier: <u>TRENTON TEL CO</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>6/26/2014</u>
Printed name of Authorized Officer: <u>Steven Tatum</u>	
Title or position of Authorized Officer: <u>Vice President</u>	
Telephone number of Authorized Officer: <u>706-398-2900</u>	
Study Area Code of Reporting Carrier: <u>220389</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: <u>TRENTON TEL CO</u>	
Name of Authorized Agent or Employee of Agent: <u>John Staurulakis, Inc.</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date:
Printed name of Authorized Agent or Employee of Agent: <u>Mark A. Ozanick</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Staff Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>7705692105 ext.</u>	
Study Area Code of Reporting Carrier: <u>220389</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**TRENTON TELEPHONE COMPANY (SAC 220389)**

**ATTACHMENT - LINE 112**

**FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

**ATTACHMENT REDACTED IN ENTIRETY**

**Trenton Telephone Company’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Trenton Telephone Company (“Trenton”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Trenton is subject to consumer protection obligations under Georgia state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Georgia Public Service Commission which discloses rates, and terms and conditions of service to customers (Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules and Regulations of the State of Georgia); (2) adherence to state consumer protection requirements governing telephone providers which require Service Standards (Chapter 515-12-1-.17 and .18 of the Rules and Regulations of the State of Georgia); Customer Billing (Chapter 515-12-1-.04(4) of the Rules and Regulations of

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

the State of Georgia; and Customer Complaints (Chapter 515-12-1-.08 of the Rules and Regulations of the State of Georgia); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules and Regulations of the State of Georgia); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Trenton is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 CFR § 8.3.

**Trenton Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:**

Trenton Telephone Company ("Trenton") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)<sup>1</sup> and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Trenton's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Trenton can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Trenton to manage traffic spikes throughout its network, as emergency situations require. In addition, Trenton has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Trenton has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Trenton has access to fuel.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."



[illegible]



(800) Operating Companies  
Data Collection Form

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvni.net
<810>	Reporting Carrier	Trenton Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

**GENERAL SUBSCRIBER SERVICES TARIFF**

**Trenton Telephone Company**  
Georgia Public Service Commission

**Section C**  
Second Revised Sheet 4

**BASIC LOCAL SERVICE****LIFELINE SERVICE TARIFF**

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**C.5 LOW INCOME PROGRAM****(C)**

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below:

1. Lifeline Assistance

a. General

Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network or its functional equivalent; local usage; access to emergency services; and toll limitation.

b. Regulations

Subscribers are eligible for Lifeline Assistance if:

- 1) The subscriber's household income is at or below 135 percent of the Federal Poverty Guidelines, or
- 2) The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

Medicaid;  
Supplemental Nutrition Assistance Program (SNAP),  
formerly known as Food Stamps;  
Supplemental Security Income (SSI);  
Federal Public Housing Assistance;  
Low-Income Home Energy Assistance Program  
(LIHEAP);  
National School Lunch Program's free lunch program;  
Temporary Assistance for Needy Families (TANF);  
Low Income Senior Citizens discount plan offered by a  
local gas or power company

**(C)**

**GENERAL SUBSCRIBER SERVICES TARIFF**

**Trenton Telephone Company**  
Georgia Public Service Commission

**Section C**  
Second Revised Sheet 5

**BASIC LOCAL SERVICE****LIFELINE SERVICE TARIFF**

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**C.5 LOW INCOME PROGRAM (Cont'd)**

(C)

**1. Lifeline Assistance (Cont'd)****b. Regulations (Cont'd)**

- 3) Other eligibility requirements may be established by the Commission.
- 4) Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that s/he receives benefits under a program outlined in sub-paragraphs (a) through (c), above, and must, on that same document, agree to notify the Company if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators.
- 5) A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.

(C)

**GENERAL SUBSCRIBER SERVICES TARIFF**

**Trenton Telephone Company**  
Georgia Public Service Commission

**Section C**  
Second Revised Sheet 6

**BASIC LOCAL SERVICE****LIFELINE SERVICE TARIFF**

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**C.5 LOW INCOME PROGRAM (Cont'd)****(C)****1. Lifeline Assistance (Cont'd)****b. Regulations (Cont'd)**

- 6) Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Company first demonstrates to the Commission that the Company would incur substantial costs, that the Company offers toll limitation without charge, and that telephone subscribership among low-income subscribers in the Company's service area is greater than or equal to the national subscribership rate for low-income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in Georgia. The Company shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Company may reapply for the waiver as necessary.
- 7) The Company may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available or if the qualifying low-income subscriber elects a calling plan that does not distinguish between toll and non-toll calls in its pricing. If toll blocking is unavailable, then the Company may charge a service deposit.

**(C)**

**GENERAL SUBSCRIBER SERVICES TARIFF**

**Trenton Telephone Company**  
Georgia Public Service Commission

**Section C**  
Second Revised Sheet 7

**BASIC LOCAL SERVICE****LIFELINE SERVICE TARIFF**

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**C.5 LOW INCOME PROGRAM (Cont'd)****(C)****1. Lifeline Assistance (Cont'd)**

- c. Effective August 1, 2012, the Lifeline credit available to an eligible customer in Georgia is equal to the total of federal support as established by the Federal Communications Commission. The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage.
- d. The Company shall apply the baseline payments received by the administrator of the federal Lifeline Assistance program to waive the qualifying customer's federal Subscriber Line Charge. The Company shall apply any additional federal support amount to the qualifying customer's basic local exchange service rate.
- e. To be eligible for Lifeline Assistance, qualifying customers must subscribe to a flat-rate basic local exchange service offering that is made available in the Company's service area.
- f. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

**(C)**

## GENERAL SUBSCRIBER SERVICES TARIFF

Trenton Telephone Company  
Georgia Public Service Commission

Section C  
Eighth Revised Sheet 2  
Cancels Seventh Revised Sheet 2

## BASIC LOCAL EXCHANGE SERVICE

## C.1 General

- A. This tariff is governed, except as otherwise specified herein, by the General Rules and Regulations of the Georgia Public Service Commission. Unless otherwise specified, the charges quoted in this tariff are periods of one month, and payable monthly in advance.
- B. The rates specified herein entitle subscribers to access all exchange access lines in the subscriber's county within the same LATA, all exchange access lines bearing the central office designations of the subscriber's exchange.
- C. The rates quoted herein, also entitle the subscriber of these exchanges to call without additional charge, subscribers in other service areas, as outlined below:

Trenton: EAS to Rising Fawn, GA; West Brow, GA; Rossville, GA; Chattanooga, TN; Bryant, AL; Chickamauga, GA; and Flat Rock, AL.

Rising Fawn: EAS to Trenton, GA; West Brow, GA; Rossville, GA; Chattanooga, TN; Bryant, AL; Chickamauga, GA; and Flat Rock, AL.

West Brow: EAS to Chattanooga, TN; Trenton, GA; Rossville, GA; Rising Fawn, GA; Bryant, AL; Chattanooga, TN; Tunnel Hill, GA; and Flat Rock, AL.

## C.1 Rates – Touchtone Access Line

Within the base rate area as specified on the attached map, rates for the Trenton Telephone Company Exchanges are as follows:

<u><b>1PB</b></u>	<u><b>2PB</b></u>	<u><b>4PB</b></u>	<u><b>ROTARY</b></u>	<u><b>1PRFR</b></u>	<u><b>2PRFR</b></u>	<u><b>4PRFR</b></u>
<b>33.20</b>	<b>27.50</b>	<b>17.14 (I)</b>	<b>49.05</b>	<b>19.54 (I)</b>	<b>19.54 (I)</b>	<b>16.39 (I)</b>

Information previously found in this Section has been moved to Section Z.

## C.3 Maps

Maps which indicate and define the exchange and base rate area limits of the respective exchanges are filed with the Georgia Public Service Commission as part of the Certificate of Public Convenience and Necessity granted by the Commission.

## GENERAL SUBSCRIBER SERVICES TARIFF

Trenton Telephone Company  
Georgia Public Service Commission

Section Z  
Fourth Revised Sheet 15  
Cancels Third Revised Sheet 15

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OBSOLETE SERVICE OFFERINGS

## MISCELLANEOUS SERVICES

## C.2 Rates – Access Line Only

Within the base rate area as specified on map attached, rate for the Trenton Telephone Company Exchanges are as follow:

<u><b>1PB</b></u>	<u><b>2PB</b></u>	<u><b>4PB</b></u>	<u><b>ROTARY</b></u>	<u><b>1PRFR</b></u>	<u><b>2PRFR</b></u>	<u><b>4PRFR</b></u>
<b>31.70</b>	<b>26.00</b>	<b>15.64 (I)</b>	<b>47.55</b>	<b>19.54 (I)</b>	<b>19.19 (I)</b>	<b>14.89 (I)</b>

**REDACTED – FOR PUBLIC INSPECTION**

**TRENTON TELEPHONE COMPANY (SAC 220389)**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**